

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

Jody E. Ratcliff,

Plaintiff,

Civil Action No.: 1:17-CV-00174

vs.

American Honda Motor Co. Inc.;
Auto Generator & Starter Service Inc.;
Avon Products Inc.;
Barnes Motor & Parts Co. Inc. (f/k/a Barnes
Motor Co.);
BMW of North America LLC;
Bobbi Brown Professional Cosmetics Inc.;
BorgWarner Morse TEC LLC;
Brenntag Specialties Inc. (f/k/a Mineral and
Pigment Solutions Inc. and Whittaker, Clark &
Daniels Inc.);
British American Tobacco PLC (d/b/a Yardley
and as successor to Yardley & Co. Ltd.);
Britain's Garage LLC;
Clinique Laboratories LLC;
Colgate-Palmolive Co.;
ConAgra Brands Inc. (f/k/a ConAgra Foods Inc.,
individually and as successor to Beatrice
Foods Co.; Esmark Inc.; and International
Playtex Inc.);
Continental Automotive Systems Inc. (f/k/a
Continental Teves Inc.);
Cyprus Amax Minerals Co.;
Dan Wise Chevrolet Inc.;
Dana Companies LLC;
Doug Henry Chevrolet Buick GMC Inc. (f/k/a
Doug Henry Chevrolet Buick Pontiac GMC
Truck Inc. and Doug Henry Chevrolet Buick
Pontiac GMC Inc.);
Doug Henry Chevrolet Inc. (f/k/a Doug Henry
Chevrolet Oldsmobile Inc.);
Edgewell Personal Care Co. (individually and as
successor to Playtex Products Inc., f/k/a
Playtex FP Group Inc, individually and as
successor to Playtex Family Products Corp.
and Playtex Holdings Inc.);
Edgewell Personal Care LLC (f/k/a Energizer

Personal Care LLC, individually and as
successor to Playtex Products Inc., f/k/a
Playtex FP Group Inc., individually and as
successor to PlaytQX Family Products Corp.
and Playtex Holdings Inc.);
Estee Lauder Inc.;
Frema Motors Inc.;
Ford Motor Co.;
Gene Taylor Inc. (f/k/a Gene Taylor Chevrolet
Inc. and Gene Taylor Chevrolet-GMC Inc.);
Genuine Parts Co.;
Hennessy Industries Inc.;
Honeywell International Inc. (f/k/a Allied Signal
Inc., as successor to the Bendix Corp.);
Imerys Talc America Inc. (f/k/a Luzenac America
Inc.);
L'Oreal SA (individually and as successor to The
Maybelline Co. and Maybelline Inc.);
L'Oreal USA Creative Inc. (d/b/a Maybelline and
f/k/a Maybelline Cosmetics Corp., individually
and as successor to The Maybelline Co. and
Maybelline Inc.);
L'Oreal USA Inc. (f/k/a Cosmair Inc.);
Maremont Corp.;
Massey Motor Co.;
Maybelline LLC;
Mitsubishi Motors North America Inc.;
National Automotive Parts Association Inc.;
Navistar Inc. (f/k/a International Truck and
Engine Corp.);
Nissan North America Inc.;
Paul Benton Motors of North Carolina LLC
(individually and as successor to Gene Taylor
Inc.; Gene Taylor Chevrolet Inc.; and Gene
Taylor Chevrolet-GMC Inc.);
Personal Care Products Council (f/k/a Cosmetics,
Toiletries, and Fragrance Association);
Playtex Products LLC (individually and as
successor to Playtex Products Inc., f/k/a
Playtex FP Group Inc., individually and as
successor to Playtex Family Products Corp.
and Playtex Holdings Inc.);
R&S Automotive;
R&S Automotive Service LLC;
Revlon Inc.;
Revlon Consumer Products Corp.;

Sale Auto Mall Inc. (f/k/a Sale Chevrolet, Buick,
BMW Inc. and Sale Chevrolet-BMW Inc., and
as successor to Poole Buick Co. Inc.);
Sale Automotive Group Inc.;
Sale Ford LLC;
Standard Motor Products Inc.;
Tampbrands Inc.;
Target Corp.;
Tilghman's Garage LLC;
The Estee Lauder Companies Inc.;
The Gillette Co.;
The Procter & Gamble Co. (individually and as
successor to Yardley of London and The
Gillette Co.);
Toyota Motor Sales USA Inc.;
Walgreen Co.;
White Owl Parts Co. Inc.
Whittaker, Clark & Daniels Inc.;
Winner Chevrolet Inc.;
Wynn Odom Ford Inc.,

Defendants.

**JOINT MOTION TO DISMISS PURPORTED CROSSCLAIMS OF DEFENDANTS
REVLON, INC. AND REVLON CONSUMER PRODUCTS CORPORATION AGAINST
DEFENDANT BOBBI BROWN PROFESSIONAL COSMETICS INC.**

NOW COME Defendants Revlon, Inc. and Revlon Consumer Products Corporation, and Defendant, Bobbi Brown Professional Cosmetics Inc., by and through counsel, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure, and hereby move the Court for an Order dismissing without prejudice, all the purported crossclaims of Defendants Revlon, Inc. and Revlon Consumer Products Corporation that were or could have been brought against Bobbi Brown Professional Cosmetics Inc., but no other defendant, in this civil action. The parties agree that all costs shall be taxed to the party incurring same.

This 31st day of July, 2017

By: /s/ Teresa E. Lazzaroni
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Hawkins Parnell Thackson Young, LLP

By: /s/ John T. Holden
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By: /s/ Edward P. Abbot
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and Revlon Consumer Products
Corporation*

CERTIFICATE OF SERVICE

I, John T. Holden, Esq., hereby certify that a true and correct copy of the foregoing **JOINT MOTION TO DISMISS PURPORTED CROSSCLAIMS OF DEFENDANTS REVLON, INC. AND REVLON CONSUMER PRODUCTS CORPORATION AGAINST DEFENDANT BOBBI BROWN PROFESSIONAL COSMETICS INC.** has been electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

By: s/John T. Holden

John T. Holden, Esquire

*Attorney for Bobbi Brown Professional
Cosmetics Inc.*

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